

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

JAMES HAYDEN,

CASE NO: 1:17CV2635

Plaintiff,

v.

2K GAMES, INC., et al.,

Defendants.

Deposition of JAMES HAYDEN

Cleveland, Ohio

Wednesday, October 30, 2019 - 9:04 a.m.

Reported by:

Angela Nixon, RMR, CRR

Job No.: 26345

1 BY MS. CENDALI:

2 Q. Did you disclose anything to the copyright office
3 about the fact that the figure of -- in the flame tattoo
4 and the phrase I hold my own were not inked by you?

5 MR. MCMULLEN: Objection.

6 A. I don't know.

7 Q. So turning to Page 176 of the document, which is
8 the second page of the document, is there anything in the
9 section on Limitation of Copyright Claim that discloses to
10 the copyright office that the drawing of the basketball
11 player and the phrase I hold my own and possibly the
12 initials D.G. were not inked by you?

13 MR. MCMULLEN: Objection.

14 A. I don't know.

15 Q. You don't see anything listed, do you?

16 MR. MCMULLEN: Objection.

17 A. In Limitation of Copyright Claim?

18 Q. Correct.

19 A. No.

20 Q. Let's take a look at what's been marked as
21 Exhibit 16, a document that appears to be another copyright
22 registration bearing the Bates Numbers Take-Two 166 through
23 215, and turning, if you would, to Page 212 of that
24 document, is that a photograph of what we've been calling
25 the scroll tattoo?

C E R T I F I C A T E

I certify that the foregoing is a correct transcript
from the record of proceedings in the above-entitled matter.

Angela D. Nixon, RMR, CRR

Date